

SALVATORE LIGA & COMPANY, PLLC

777 Westchester Avenue, Suite 101
White Plains, New York 10604
(877) 725-5442
(917) 591-8818 Fax

March 27, 2017

Via ECF & Electronic Mail

Hon. Katherine Polk Failla, U.S.D.J.
United States District Court, S.D.N.Y.
40 Foley Square, Room 2103
New York, New York 10007
E: Failla_NYSDChambers@nysd.uscourts.gov

***Re: Orue et al v. Artisanal Fromagerie & Bistro LLC, et al.
Civil Action No: 15 Civ 5727 (KPF)***

Dear Judge Failla:

Upon receiving Mr. Schaffer's letter, dated March 23, 2017, and the Court's order regarding a response, I immediately reached out to Mr. Sarid Drory and Ms. Stephanie Schulman.

Friday evening, I was able to speak directly with Mr. Sarid several times. Ms. Schulman was in an airport on her way to Utah, nevertheless, we were eventually able to text each other several times. I also had an opportunity to speak with attorney Mitch Greene. Mr. Greene, who was traveling Friday evening, was kind enough to call me and to speak to me briefly. Since Friday, I have spoken to Mr. Drory several times.

It is also worth noting that I was unaware of the second bankruptcy filing until reading Mr. Schaffer's letter.

On behalf of Mr. Sarid Drory, I am responding to Mr. Schaffer's letter to the Court, dated March 23, 2017, as follows based upon my conversations as outlined above.

**I. WITH REGARD TO THE ALLEGATION THAT DEFENDANT DRORY
BLATANTLY MISLED THE COURT REGARDING HIS INVOLVEMENT
IN THE NEW ARTISANAL LOCATION**

It was stated in Court that Mr. Drory and the original restaurant was the inspiration for the new location. It was also stated that he did not own the entity involved, nor was he the owner of the lease to the new location. Mr. Drory stands by all of these statements.

While Mr. Drory was involved in the intial signing of the lease, almost 2 years ago, he was forced to sell his interest in the same a month afterwards when he was unable to repay Stephanie

Schulman monies he had borrowed from her. Since that time, Ms. Schulman has been the sole owner of *Artisanal 2015, LLC* and the lease. Furthermore, said entity's sole asset is the lease, as well as, any improvements made to the space. All the documents pertaining to said transfer were signed and notarized at the time, approximately one year and eight months ago.

Mr. Drory has been involved with overseeing the design and improvements being made at the new location - something he has never denied. Despite said involvement, he was never been paid to do so by Ms. Schulman. Ms. Schulman is Mr. Drory's girlfriend and the two live together. She has been supporting him and his involvement in the project is his way of pitching in and trying to help protect the very substantial investments she has made into the new location. Ms. Schulman works full-time as a corporate attorney who frequently travels for business. Without Mr. Drory's help at times, it would be very difficult for her to keep the project moving forward. .

Mr. Drory is personally insolvent and as he stated to the Court he is currently subject to a seven figure tax lien.

The second bankruptcy filed by *Artisanal 2015, LLC* was filed by Ms. Schulman in response to a dispute with the landlord. In no way has Mr. Drory been represented or alleged to be an owner of *Artisanal 2015, LLC* and that any statements to the contrary are a mistake or were made for convenience purposes.

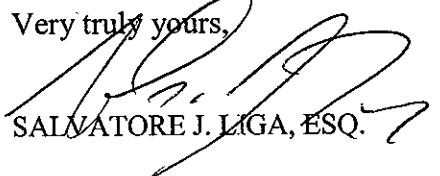
**II. WITH REGARD TO DEFENDANTS FAILURE TO COMPLY
WITH THE COURT'S ORDER**

Mr. Drory is willing to provide any and all documentation regarding his personal finances, as well as, those regarding his personal business dealings. He has only asked for additional time to complete the very extensive list of documentation requested by Mr. Schaffer.

Mr. Drory is asking for 2-3 weeks of additional time to get his documentation together.

Ms. Schulman who is not a party to this lawsuit is not so willing to provide any such documentation regarding her business dealings, her personal finances and those of any entity she is the sole owner of.

Given Mr. Drory's lack of resources, he must rely on the cooperation of others to help him obtain the documents requested. .

Very truly yours,

SALVATORE J. LIGA, ESQ.